

I have been a licensed Amateur Radio Operator for 48 years, getting my Novice in January 1955 and earning my Amateur Extra in 1977. I became a VE in 1984. Further, I worked in electronics for 20 years and am now a Professor Emeritus, having retired from a major community college district after twenty years. I am neither an engineer nor attorney, as many of the writers of petitions and comments seem to be. Still, this background gives me good insight into the level of knowledge needed to function on technical and communications planes.

I speak only for myself, not for any amateur related organizations that I belong to; nor do they speak for me.

My opinion of RM-10784 is that it should be denied for the following reasons: It is ill conceived, illogical and ill written.

Paragraph 1 is hard to understand, although I think I might get the intent.

Paragraph 2 and 3 want to eliminate Element 1 for General but retain it for Extra. The latter would cause a conflict with uncoded CEPT and IARU holders (see paragraph 10). As always, in conflict of privileges, the lower prevails. As an example, if Mr. Reich's residence is on a road with a 45 MPH limit, this does not give him permission to drive at that speed; the posted limit prevails.

In paragraph 4, Element 3 would have to be revised to cover CW, just as SSB, FM and other modes are now. See comment expanded below.

Paragraph 5 is of commercial intent and has no place in this petition.

Paragraph 8 refers to other administrations, who have the right, as we do, to set their own standards. Re paragraph 11, we are not bound by other's decisions.

Paragraph 9 means that the newly tested Tech's would now be Generals if Element 1 is revoked, just as they would have been by routinely upgrading.

Given the scenario that Element 1 is eliminated for whatever reason, then Elements 2, 3 and 4 would have to be modified to include appropriate questions on Morse operation because of it's high usage, just as SSB, FM, packet and other modes are now tested.

Consider then, the number of questions currently in each element are 35, 35 and 50, respectively. What current valid questions would have to be removed? In this regard, I refer the reader to the yet unnumbered petition by AE4FA and K0PU, where they critically analyze the contents of the National Conference of Volunteer Examiner Coordinators (NCVEC) pools over the years. Part 97.1 (d) mentions "...trained operators, technicians, and electronics experts." I often wonder how answering 75% of 120 known questions does an expert make??

The unnumbered petition is available several places on the Internet. If you don't have access, please ask a friend to do a search (www.QRZ.com is a good starter) and provide you with a copy.

I would urge the interested reader to research Mr. Reich's other petitions and comments within the FCC database.

I cannot support this petition.